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9
10 **BEFORE THE**
11 **PHYSICIAN ASSISTANT BOARD**
12 **DEPARTMENT OF CONSUMER AFFAIRS**
13 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation and Petition to
14 Revoke Probation Against:

15 **RAIF WADIE ISKANDER, P.A.**
16 **22 Winslow Street**
17 **Ladera Ranch, CA 92694**

18 **Physician Assistant License No. PA 21793**

19 Respondent.

Case No. 950-2019-002244

OAH No.

**ACCUSATION AND PETITION TO
REVOKE PROBATION**

20 **PARTIES**

21 1. Rozana Khan (Complainant) brings this Accusation and Petition to Revoke Probation
22 solely in her official capacity as the Executive Officer of the Physician Assistant Board,
23 Department of Consumer Affairs.

24 2. On or about September 7, 2011, the Physician Assistant Board (Board) issued
25 Physician Assistant License No. PA 21793 to Raif Wadie Iskander, P.A. (Respondent). The
26 Physician Assistant License expired on November 30, 2020, and has not been renewed.

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1 **PRIOR DISCIPLINE**

2 3. In a prior disciplinary action entitled *In the Matter of the Accusation Against Raif*
3 *Wadie Iskander, P.A.*, Case No. 950-2016-000846, the Board issued a Decision and Order,
4 effective July 19, 2019, in which Respondent's Physician Assistant License No. PA 21793 was
5 revoked. The revocation was stayed, however, and Respondent's Physician Assistant License
6 No. PA 21793 was placed on probation for a period of five (5) years on certain terms and
7 conditions. A true copy of that Decision and Order is attached hereto as Exhibit A and
8 incorporated by reference as if fully set forth herein.

9 **JURISDICTION**

10 4. This Accusation and Petition to Revoke Probation is brought before the Board under
11 the authority of the prior disciplinary order entitled *In the Matter of the Accusation Against Raif*
12 *Wadie Iskander, P.A.*, Case No. 950-2016-000846 and the following laws. All section references
13 are to the Business and Professions Code (Code) unless otherwise indicated.

14 **STATUTORY PROVISIONS**

15 5. Section 3527 of the Code states:

16 (a) The board may order the denial of an application for, or the issuance subject
17 to terms and conditions of, or the suspension or revocation of, or the imposition of
18 probationary conditions upon a PA license after a hearing as required in Section 3528
19 for unprofessional conduct that includes, but is not limited to, a violation of this
chapter, a violation of the Medical Practice Act, or a violation of the regulations
adopted by the board or the Medical Board of California.

20 ...

21 (d) The board may order the licensee to pay the costs of monitoring the
probationary conditions imposed on the license.

22 (e) The expiration, cancellation, forfeiture, or suspension of a PA license by
23 operation of law or by order or decision of the board or a court of law, the placement
of a license on a retired status, or the voluntary surrender of a license by a licensee
24 shall not deprive the board of jurisdiction to commence or proceed with any
investigation of, or action or disciplinary proceeding against, the licensee or to render
25 a decision suspending or revoking the license.

26 6. Section 3528 of the Code states any proceedings involving the denial, suspension, or
27 revocation of the application for licensure or the license of a PA or the application for approval or
28 the approval of an approved program under this chapter shall be conducted in accordance with

Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code.

7. Section 2234 of the Code states:

The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.

...

(e) The commission of any act involving dishonesty or corruption that is substantially related to the qualifications, functions, or duties of a physician and surgeon.

(f) Any action or conduct that would have warranted the denial of a certificate.

...

8. Section 2236 of the Code states:

(a) The conviction of any offense substantially related to the qualifications, functions, or duties of a physician and surgeon constitutes unprofessional conduct within the meaning of this chapter. The record of conviction shall be conclusive evidence only of the fact that the conviction occurred.

...

(c) ... The division may inquire into the circumstances surrounding the commission of a crime in order to fix the degree of discipline or to determine if the conviction is of an offense substantially related to the qualifications, functions, or duties of a physician and surgeon.

(d) A plea or verdict of guilty or a conviction after a plea of *nolo contendere* is deemed to be a conviction within the meaning of this section The record of conviction shall be conclusive evidence of the fact that the conviction occurred.

9. Section 3531 of the Code states:

A plea or verdict of guilty or a conviction following a plea of *nolo contendere* made to a charge of a felony or of any offense which is substantially related to the qualifications, functions, or duties of the business or profession to which the license was issued is deemed to be a conviction within the meaning of this chapter. The board may order the license suspended or revoked, or shall decline to issue a license when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code allowing such person to withdraw his or her plea of guilty and to enter a plea of not guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or indictment.

1 10. Section 2237 of the Code states:

2 (a) The conviction of a charge of violating any federal statutes or regulations or
3 any statute or regulation of this state, regulating dangerous drugs or controlled
4 substances, constitutes unprofessional conduct. The record of the conviction is
5 conclusive evidence of such unprofessional conduct. A plea or verdict of guilty or a
6 conviction following a plea of *nolo contendere* is deemed to be a conviction within
7 the meaning of this section.

8 ...

9 11. Section 2238 of the Code states:

10 A violation of any federal statute or federal regulation or any of the statutes or
11 regulations of this state regulating dangerous drugs or controlled substances
12 constitutes unprofessional conduct.

13 12. Section 2242 of the Code states:

14 (a) Prescribing, dispensing, or furnishing dangerous drugs as defined in Section
15 4022 without an appropriate prior examination and a medical indication, constitutes
16 unprofessional conduct. ...

17 ...

18 13. Health and Safety Code section 11152 states:

19 No person shall write, issue ... or dispense a prescription that does not conform
20 to this division.¹

21 14. Health and Safety Code section 11171 states:

22 No person shall prescribe ... a controlled substance except under the conditions
23 and in the manner provided by this division.

24 15. Health and Safety Code section 11153 states:

25 (a) A prescription for a controlled substance shall only be issued for a
26 legitimate medical purpose by an individual practitioner acting in the usual course of
27 his or her professional practice. The responsibility for the proper prescribing and
28 dispensing of controlled substances is upon the prescribing practitioner Except as
29 authorized by this division, the following are not legal prescriptions: (1) an order
30 purporting to be a prescription which is issued not in the usual course of professional
31 treatment or in legitimate and authorized research; ...

32 ...

33 ////

34 ////

35

¹ Health and Safety Code, Division 10, Uniform Controlled Substances Act.

1 16. Health and Safety Code section 11157 states:

2 No person shall issue a prescription that is false or fictitious in any respect.

3 17. Section 4021 of the Code states:

4 “Controlled substance” means any substance listed in Chapter 2 (commencing
5 with Section 11053) of Division 10 of the Health and Safety Code.

6 18. Section 4022 of the Code states:

7 “Dangerous drug” ... means any drug or device unsafe for self-use in humans
8 or animals, and includes the following:

9 (a) Any drug that bears the legend: “Caution: federal law prohibits dispensing
10 without prescription,” “Rx only,” or words of similar import.

11 ...

12 (c) Any other drug ... that by federal or state law can be lawfully dispensed
13 only on prescription or furnished pursuant to Section 4006.

14 19. Title 21, United States Code Controlled Substances Act, section 841, states:

15 (a) Unlawful acts

16 Except as authorized by this subchapter, it shall be unlawful for any person
17 knowingly or intentionally —

18 (1) to manufacture, distribute, or dispense, or possess with intent to
19 manufacture, distribute, or dispense, a controlled substance;

20 ...

21 20. Title 21, United States Code Controlled Substances Act, section 843, states:

22 (a) Unlawful acts

23 It shall be unlawful for any person knowingly or intentionally—

24 ...

25 (3) to acquire or obtain possession of a controlled substance by
26 misrepresentation, fraud, forgery, deception, or subterfuge;

27 ...

28 (4)(A) to furnish false or fraudulent material information in, or omit any
material information from, any application, report, record, or other document required
to be made, kept, or filed under this subchapter or subchapter II of this chapter ...

...

1 (2) The number of years elapsed since the date of the offense; and,

2 (3) The nature and duties of a physician assistant.

3 (c) For purposes of subdivision (a), substantially related crimes, professional
4 misconduct, or acts shall include, but are not limited to, the following:

5 (1) Violating or attempting to violate, directly or indirectly, or assisting in or
6 abetting the violation of, or conspiring to violate any provision or term of the Medical
7 Practice Act.

8 (2) Violating or attempting to violate, directly or indirectly, or assisting in or
9 abetting the violation of, or conspiring to violate any provision or term of the
10 Physician Assistant Practice Act or other state or federal laws governing the practice
11 of physician assistants.

12 ...

13 (5) Any crime, professional misconduct, or act involving the sale, gift,
14 administration, or furnishing of narcotics or dangerous drugs or dangerous devices, as
15 defined in Section 4022 of the code.

16 ...

17 COST RECOVERY

18 26. Section 125.3 of the Code states that:

19 (a) Except as otherwise provided by law, in any order issued in resolution of a
20 disciplinary proceeding before any board within the department ... upon request of
21 the entity bringing the proceeding, the administrative law judge may direct a licensee
22 found to have committed a violation or violations of the licensing act to pay a sum not
23 to exceed the reasonable costs of the investigation and enforcement of the case.

24 (b) In the case of a disciplined licentiate that is a corporation or a partnership,
25 the order may be made against the licensed corporate entity or licensed partnership.

26 (c) A certified copy of the actual costs, or a good faith estimate of costs where
27 actual costs are not available, signed by the entity bringing the proceeding or its
28 designated representative shall be *prima facie* evidence of reasonable costs of
investigation and prosecution of the case. The costs shall include the amount of
investigative and enforcement costs up to the date of the hearing, including, but not
limited to, charges imposed by the Attorney General.

...

(g)(1) Except as provided in paragraph (2), the board shall not renew or
reinstate the license of any licensee who has failed to pay all of the costs ordered
under this section.

(2) Notwithstanding paragraph (1), the board may, in its discretion,
conditionally renew or reinstate for a maximum of one year the license of any
licensee who demonstrates financial hardship and who enters into a formal agreement
with the board to reimburse the board within that one-year period for the unpaid
costs.

FACTUAL ALLEGATIONS

The Conspiracy:

27. At all relevant times, Respondent was a physician assistant licensed to practice medicine in California and working for a medical practice located in Orange County.

28. From approximately 2018 and continuing to on or about April 18, 2019, there was an agreement between Respondent and several drug brokers, by which Respondent would receive cash bribes from the drug brokers in exchange for prescriptions for oxycodone. Respondent would write prescriptions for oxycodone by filling in the drug type, dosage, and pill quantity on the prescription but leaving the patient name blank, so that a drug broker could fill in the patient name later.

29. The drug brokers would provide to Respondent the names and dates of birth of persons whose names could be used on the prescriptions as purported patients. Respondent would check the prescription history of the purported patients to see if their names could be used without attracting the scrutiny of the Drug Enforcement Administration.

30. Respondent would provide the prescriptions to various drug brokers, knowing that the oxycodone filled from the prescriptions would be sold to drug customers who were not using the oxycodone for legitimate medical purposes and whom Respondent had never met or examined.

31. The drug brokers would then sell the prescriptions or the oxycodone filled from the prescriptions for cash, and share the proceeds with Respondent.

32. On or about December 18, 2018, Respondent wrote a prescription for 120 pills of 30 mg oxycodone, leaving the patient name blank, and sold the prescription to a drug broker ("Broker 1") for about \$1,000, knowing Broker 1 would distribute the oxycodone.

33. At a parking lot in Irvine, California, Broker 1 wrote a name on the prescription of the purportedly receiving 'patient' and delivered the prescription to a co-conspirator. ("Co-conspirator"). Co-conspirator then filled the prescription at a pharmacy in Newport Beach, California, and gave 108 pills of oxycodone for \$2,400 to a drug customer, who was in reality an undercover law enforcement officer.

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1 34. On or about February 23, 2019, at a café in Aliso Viejo, California, Respondent met
2 with Broker 1, who was at that point cooperating with law enforcement. Respondent wrote six
3 (6) prescriptions for 120 pills of 30 mg oxycodone each, leaving the patient name blank, and gave
4 the prescriptions to Broker 1.

5 35. On or about March 18, 2019, at the same café in Aliso Viejo, Respondent accepted
6 from Broker 1 \$2,500 in cash as payment for the six prescriptions Respondent had previously
7 provided on or about February 23, 2019.

8 36. Respondent wrote four (4) more prescriptions for 120 pills of 30 mg oxycodone each,
9 leaving the patient name blank, and gave them to Broker 1.

10 37. In addition to the above, between 2018 and April 15, 2019, Respondent wrote
11 prescriptions for a total of 115.2 grams of oxycodone that Respondent gave to a drug broker,
12 knowing they would not be used for a legitimate medical purpose.

13 *The Conviction:*

14 38. On or about April 26, 2021, in the case entitled *United States of America v. Raif*
15 *Wadie Iskander et al*, USDC Central District, Southern Division, Case No. SACR19-00136JVS,
16 Respondent pleaded guilty to, and was convicted of, one count of Conspiracy to Distribute
17 Oxycodone and Acquire a Controlled Substance by Misrepresentation, Fraud, Forgery,
18 Deception, and Subterfuge, in violation of Title 21, United States Code, Sections 846, 841(a)(1),
19 and 843(a)(3).

20 39. On or about May 16, 2022, Respondent was sentenced to forty-six (46) months'
21 imprisonment and ordered to surrender himself to such imprisonment on or before August 22,
22 2022.

23 *Respondent's Prior Discipline with the Board:*

24 40. Effective July 19, 2019, Respondent's Physician Assistant License No. PA 21793 was
25 revoked, stayed, and placed on probation for a period of five (5) years on certain terms and
26 conditions.

27 41. On or about August 14, 2019, Respondent did a telephone interview with his
28 probation monitor, during which all the terms and conditions of his probation were reviewed.

42. At all times after the effective date of Respondent's probation in Case No. 950-2016-000846, Condition No. 2 provided, in pertinent part:

CLINICAL TRAINING PROGRAM Within 60 days of the effective date of this decision, respondent shall submit to the Board or its designee for prior approval, a clinical training or educational program such as the Physician Assessment and Clinical Education Program (PACE) offered by the University of California - San Diego School of Medicine or equivalent program as approved by the Board or its designee. The exact number of hours and specific content of the program shall be determined by the Board or its designee. The program shall determine whether respondent has successfully completed and passed the program.

...

Respondent shall successfully complete and pass the program not later than six months after respondent's initial enrollment. The program determines whether or not the respondent successfully completes the program. If respondent fails to either 1) complete the program within the designated time period, or 2) to pass the program, as determined by the program, respondent shall cease practicing as a physician assistant immediately after being notified by the Board or its designee.

43. At no time since the effective date of Respondent's probation has he either enrolled in or completed a clinical training or educational program as required by Condition No. 2 of his probation.

44. At all times after the effective date of Respondent's probation in Case No. 950-2016-000846, Condition No. 5 provided, in pertinent part:

APPROVAL OF SUPERVISING PHYSICIAN Within 30 days of the effective date of this decision, respondent shall submit to the Board or its designee for its-prior approval the name and license number of the supervising physician and a practice plan detailing the nature and frequency of supervision to be provided. Respondent shall not practice until the supervising physician and practice plan are approved by the Board or its designee...

45. Respondent failed to submit the required paperwork and no practice plan was ever approved by the Board of any designee as required by Condition No. 5.

46. At all times after the effective date of Respondent's probation in Case No. 950-2016-000846, Condition No. 8 provided:

QUARTERLY REPORTS Respondent shall submit quarterly declarations under penalty of perjury on forms provided by the Board or its designee, stating whether there has been compliance with all the conditions of probation.

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1 47. On or about August 18, 2019, Respondent signed an acknowledgement of the due
2 dates for his required Quarterly Declaration for each reporting time period. Respondent's first
3 Quarterly Declaration was due by no later than October 10, 2019.

4 48. The Board did not receive Respondent's Quarterly Declaration by October 10, 2019,
5 or at all. The Board has not received any Quarterly Declaration from Respondent during the
6 period of probation.

7 49. At all times after the effective date of Respondent's probation in Case No. 950-2016-
8 000846, Condition No. 11 provided, in pertinent part:

9 NON-PRACTICE WHILE ON PROBATION Respondent shall notify the
10 Board or its designee in writing within 15 calendar days of any periods of non-
11 practice lasting more than 30 calendar days. Non-practice is defined as any
12 period of time exceeding 30 calendar days in which respondent is not practicing
13 as a physician assistant. Respondent shall not return to practice until the
14 supervising physician is approved by the Board or its designee.

15 ...

16 Any period of non-practice, as defined in this condition, will not apply to the
17 reduction of the probationary term.

18 Periods of non-practice do not relieve respondent of the responsibility to
19 comply with the terms and conditions of probation.

20 It shall be considered a violation of probation if for a total of two years,
21 respondent fails to practice as a physician assistant. ...

22 50. No practice was possible without an approved practice agreement. Respondent
23 informed his probation monitor on or about September 3, 2019, that his employment had been
24 terminated as a result of his arrest. Respondent has been incarcerated and serving his sentence
25 since at least August 22, 2022.

26 51. At all times after the effective date of Respondent's probation in Case No. 950-2016-
27 000846, Condition No. 16 provided:

28 COST RECOVERY The respondent is hereby ordered to reimburse the
Physician Assistant Board the amount of \$12,670.50 within 90 days from the
effective date of this decision for its investigative and enforcement costs.
Failure to reimburse the Board's costs for its investigation and prosecution shall
constitute a violation of the probation order, unless the Board agrees in writing
to payment by an installment plan because of financial hardship. The filing of
bankruptcy by the respondent shall not relieve the respondent of his/her
responsibility to reimburse the Board for its investigative and enforcement
costs.

52. Respondent has not entered into a payment by installment plan with the Board and has not paid cost recovery of \$12,670.50.

53. At all times after the effective date of Respondent's probation in Case No. 950-2016-000846, Condition No. 17 provided:

PROBATION MONITORING COSTS -Respondent shall pay the costs associated with probation monitoring each and every year of probation, as designated by the Board, which may be adjusted on an annual basis. The costs shall be made payable to the Physician Assistant Board and delivered to the Board no later than January 31 of each calendar year.

54. Respondent owed \$418.75 in probation monitoring costs for 2019, which amount was due and payable on or before January 31, 2020. Respondent has made no payments towards his probation monitoring costs for 2019 or for any subsequent year.

FIRST CAUSE TO REVOKE PROBATION

(Failure to Obey All Laws)

55. At all times after the effective date of Respondent's probation in Case No. 950-2016-000846, Condition No. 7 provided:

OBEY ALL LAWS: Respondent shall obey all federal, state, and local laws, and all rules governing the practice of medicine as a physician assistant in California, and remain in full compliance with any court ordered criminal probation, payments, and other orders.

56. Respondent's probation is subject to revocation because he failed to comply with Condition No. 7 of his probation in Case No. 950-2016-000846, as more particularly described in paragraphs 38 through 54, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

SECOND CAUSE TO REVOKE PROBATION

(Failure to Enroll In and Complete Clinical Training Program)

57. Respondent's probation is subject to revocation because he failed to comply with Condition No. 2 of his probation in Case No. 950-2016-000846, as more particularly described in paragraphs 40 through 43, above, which are hereby incorporated by reference and realleged as if fully set forth herein.

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1 **THIRD CAUSE TO REVOKE PROBATION**

2 **(Failure to Obtain Board Approval of a Supervising Physician and/or Practice Plan)**

3 58. Respondent's probation is subject to revocation because he failed to comply with
4 Condition No. 5 of his probation in Case No. 950-2016-000846, as more particularly described in
5 paragraphs 40, 41, 44 and 45, above, which are hereby incorporated by reference and realleged as
6 if fully set forth herein.

7 **FOURTH CAUSE TO REVOKE PROBATION**

8 **(Failure to Submit Quarterly Declarations)**

9 59. Respondent's probation is subject to revocation because he failed to comply with
10 Condition No. 8 of his probation in Case No. 950-2016-000846, as more particularly described in
11 paragraphs 40, 41, and 46 through 48, above, which are hereby incorporated by reference and
12 realleged as if fully set forth herein.

13 **FIFTH CAUSE TO REVOKE PROBATION**

14 **(Non-Practice While On Probation)**

15 60. Respondent's probation is subject to revocation because he failed to comply with
16 Condition No. 11 of his probation in Case No. 950-2016-000846, as more particularly described
17 in paragraphs 40, 41, 49 and 50, above, which are hereby incorporated by reference and realleged
18 as if fully set forth herein.

19 **SIXTH CAUSE TO REVOKE PROBATION**

20 **(Failure to Pay Cost Recovery)**

21 61. Respondent's probation is subject to revocation because he failed to comply with
22 Condition No. 16 of his probation in Case No. 950-2016-000846, as more particularly described
23 in paragraphs 40, 41, 51 and 52, above, which are hereby incorporated by reference and realleged
24 as if fully set forth herein.

25 **SEVENTH CAUSE TO REVOKE PROBATION**

26 **(Failure to Pay Probation Monitoring Costs)**

27 62. Respondent's probation is subject to revocation because he failed to comply with
28 Condition No. 17 of his probation in Case No. 950-2016-000846, as more particularly described

1 in paragraphs 40, 41, 53 and 54, above, which are hereby incorporated by reference and realleged
2 as if fully set forth herein.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Conviction of a Crime Substantially Related**
5 **to the Qualifications, Functions, or Duties of a Physician Assistant)**

6 63. Respondent is subject to disciplinary action under Code sections 3527, 3531, and
7 2234, as defined by section 2236, subdivision (a), of the Code, and California Code of
8 Regulations, title 16, sections 1399.521 and 1399.525, in that he has been convicted of a crime
9 substantially related to the qualifications, functions, or duties of a physician assistant, as more
10 particularly described in paragraphs 27 through 39, above, which are hereby incorporated by
11 reference and realleged as if fully set forth herein.

12 **SECOND CAUSE FOR DISCIPLINE**

13 **(Drug Related Conviction)**

14 64. Respondent is further subject to disciplinary action under sections 3527, 3531, and
15 2234, as defined by section 2237, of the Code, and California Code of Regulations, title 16,
16 section 1399.521, subdivision (a), in that he has been convicted of a charge of violating a federal
17 statute or regulation regulating dangerous drugs or controlled substances, as more particularly
18 described in paragraphs 27 through 39, above, which are hereby incorporated by reference and
19 realleged as if fully set forth herein.

20 **THIRD CAUSE FOR DISCIPLINE**

21 **(Violation of Drug Statutes)**

22 65. Respondent is further subject to disciplinary action under sections 3527 and
23 California Code of Regulations, title 16, section 1399.521, subdivision (a), as defined by section
24 2238 of the Code, in that he violated federal and/or state statutes or regulations regulating
25 dangerous drugs or controlled substances, as more particularly described in paragraphs 27
26 through 39, above, which are hereby incorporated by reference and realleged as if fully set forth
27 herein.

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1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Acts of Dishonesty or Corruption)**

3 66. Respondent is further subject to disciplinary action under sections 3527 and 2234, as
4 defined by section 2234, subdivision (e), of the Code, in that he committed acts of dishonesty or
5 corruption, as more particularly described in paragraphs 27 through 39, above, which are hereby
6 incorporated by reference and realleged as if fully set forth herein.

7 **FIFTH CAUSE FOR DISCIPLINE**

8 **(Prescribing Dangerous Drugs Without an Appropriate Exam)**

9 67. Respondent is further subject to disciplinary action under sections 3527 and 2234, as
10 defined by section 2242 of the Code, in that he prescribed, dispensed or furnished dangerous drugs
11 without an appropriate prior examination and a medical indication, as more particularly described
12 in paragraphs 27 through 39, above, which are hereby incorporated by reference and realleged as
13 if fully set forth herein..

14 **SIXTH CAUSE FOR DISCIPLINE**

15 **(General Unprofessional Conduct)**

16 68. Respondent is further subject to disciplinary action under sections 3527 and
17 California Code of Regulations, title 16, sections 1399.521, subdivision (a), and 1399.525, as
18 defined by section 2234 of the Code, in that he has engaged in conduct which breaches the rules
19 or ethical code of the medical profession, or conduct which is unbecoming of a member in good
20 standing of the medical profession, and which demonstrates an unfitness to practice medicine, as
21 more particularly described in paragraphs 27 through 67, above, which are hereby incorporated
22 by reference and realleged as if fully set forth herein.

23 **PRAYER**

24 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
25 and that following the hearing, the Physician Assistant Board issue a decision:

26 1. Revoking probation and carrying out the discipline that was stayed in Case No. 950-
27 2016-000846, revoking Respondent's Physician Assistant License No. PA 21793;

28 ////

1 2. Revoking or suspending Physician Assistant License No. PA 21793, issued to
2 Respondent Raif Wadie Iskander, P.A.;

3 3. Ordering Respondent Raif Wadie Iskander, P.A., to pay the Physician Assistant
4 Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business
5 and Professions Code section 125.3; and,

6 4. Taking such other and further action as deemed necessary and proper.
7

8
9 DATED: February 9, 2023

Rozana Khan

ROZANA KHAN
Executive Officer
Physician Assistant Board
Department of Consumer Affairs
State of California
Complainant